

Ira Spiegel
IMSPIEGEL, LLC
Proposed Accountant for the Debtor
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re : Chapter 11
1934 BEDFORD LLC :
Debtor. : Case No. 19-44751-cec
:

DECLARATION OF IRA SPIEGEL IN SUPPORT OF THE APPLICATION
FOR RETENTION OF IMSPIEGEL, LLC AS ACCOUNTANT AND FINANCIAL
ADVISOR TO THE DEBTOR NUNC PRO TUNC AS OF SEPTEMBER 12, 2019

IRA SPIEGEL, declares and states that the following is true to the best of my knowledge, information and belief:

1. I am a Certified Public Accountant and the sole member of IMSPIEGEL, LLC (“SPIEGEL”), which maintains its office at 1419 E. 101st Street, Brooklyn, NY, 11236 and as such am fully familiar with the facts and circumstances as set forth herein.
2. I have extensive familiarity with accounting practices in insolvency matters in the bankruptcy courts.

3. This declaration is being submitted in connection with the application of the Debtor to retain SPIEGEL as its accountant in the above-captioned Chapter 11 Debtor case.

4. To the best of my knowledge and belief I, and by extension my firm, am a “disinterested person” within the meaning of Section 101(14) of the Bankruptcy Code, and have no interest, nor does it represent or will it represent any interest adverse to the Debtor, creditors, parties-in-interest or their respective attorneys or accountants. In the course of my practice I may have been retained, through my prior employer, in other matters in which some of the parties to this proceeding may have been parties. I am currently retained in a non-related case by a Chapter 7 Trustee who has also retained Mr. Weiner.

5. I have reviewed a list of parties in interest as they are currently known, including secured and unsecured creditors and have determined to the best of my knowledge, after due inquiry, that I do not represent any such entity nor have I previously.

6. I have discussed the services required with the Debtor and Debtor’s attorney, which services consist of the following:

- a) Monitoring the activities of the Debtor.
- b) Assisting in or the preparation of and/or reviewing monthly operating reports, budgets and projections.
- c) Reviewing the filed claims for reasonableness against the Debtor’s records and filing schedules.
- d) Interacting with the Creditors’ Committee and its retained professionals (the “Creditors”), should one be appointed.
- e) As required, attending meetings with the Debtor and Counsel, meetings with the Creditors and Court hearings.

- f) Assisting in the preparation of the Plan of Reorganization and the Disclosure Statement.
- g) Other assistance as the Debtor and counsel may deem necessary.

7. The services to be rendered will be charged at the following rates:

| | |
|--------|-------------------|
| Member | \$245.00 per hour |
|--------|-------------------|

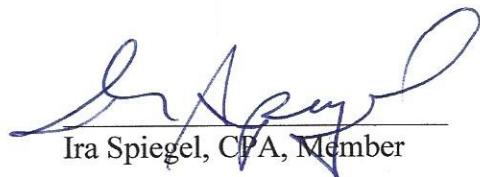
Based upon the nature of the case, SPIEGEL estimates that the cost of the proposed services will be between \$5,000 and \$8,000.

8. SPIEGEL has not received a retainer. SPIEGEL has not reviewed the books or accounts of the Debtor pending an initial meeting.

9. SPIEGEL shall seek to be compensated for services rendered and for reimbursement of disbursements upon appropriate application to this court in accordance with the bankruptcy code, bankruptcy rules, fee guidelines and the terms of any administrative procedures order entered in this case regarding the filing of applications for compensation.

I hereby declare that the foregoing is accurate and true to the best of my knowledge.

Dated: October 11, 2019
Brooklyn, New York



Ira Spiegel, CPA, Member